

Arch and USASF have further settled and resolved their disputes with respect to the Abuse Claims that were asserted against USASF by clients of the Strom Law Firm. Arch withdraws its demand for declaratory relief with prejudice (Count I) only as to USASF with respect only to the above-listed Abuse Lawsuits and Abuse Claims asserted against USASF by clients of the Strom

Law Firm. USASF withdraws its Counterclaims with prejudice with respect only to the above-listed Abuse Lawsuits and Abuse Claims asserted against USASF by clients of the Strom Law Firm.

2. Except as stated in Paragraph 3 below, USASF and Arch do not stipulate to settle, resolve, waive, or dismiss any causes of action, claims or defenses that Arch or USASF have asserted or may assert: (1) against VBH or any person other than Arch and USASF; or (2) against each other with respect to the following Abuse Lawsuits:

- *John Doe v. Estate of Foster*, Greenville County, S.C., No. 2202CP2304753;
- *Jane Doe v. Texas Wolverine All-Stars, Inc.*, Bexar Co. Texas Dist. Ct., Cause No. 2022CI19481;
- *Gerlacher v. Cheer Athletics, Inc.*, Travis County Texas District Ct., Case No. D-1-GN-21-003338;
- *Jane K. Doe v. World Cheer Center, LLC*, Lake County Florida District Court, Case No. 2023CA295.

3. Count IV of USASF's Counterclaim (ECF 61) against Arch is hereby dismissed with prejudice as to all underlying claims identified in Paragraph 49 of USASF's Counterclaim, together with all other claims asserted by clients of the Strom Law Firm, except for the following Abuse Lawsuits, which USASF also agrees to dismiss but as to them, and them alone, the dismissal is without prejudice:

- *John Doe v. Estate of Foster*, Greenville County, S.C., No. 2202CP2304753;
- *Jane Doe v. Texas Wolverine All-Stars, Inc.*, Bexar Co. Texas Dist. Ct., Cause No. 2022CI19481;
- *Gerlacher v. Cheer Athletics, Inc.*, Travis County Texas District Ct., Case No. D-1-GN-21-003338;
- *Jane K. Doe v. World Cheer Center, LLC*, Lake County Florida District Court, Case No. 2023CA295.

4. Arch's Motion to Dismiss Count IV of USASF's Counterclaim (ECF 74) is hereby withdrawn.

5. Arch shall have 30 days from the date of this stipulation to file its answer to the remaining allegations of USASF's Counterclaim. The parties agree that Arch need not file an answer as to the allegations of USASF's Counterclaim dismissed pursuant to this Stipulation.

Dated: March 20, 2025

**BURCH, PORTER &
JOHNSON, PLLC**

By: /s/ Melissa A. Maravich

Melissa A. Maravich (#13876)

David E. Goodman, Jr. (#21493)

130 North Court Avenue

Memphis, Tennessee 38103

(901) 524-5000

mmaravich@bpjlaw.com

dgoodman@bpjlaw.com

Attorneys for U.S. All Star Federation, Inc.

**HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER**

By: /s/ Ronald P. Schiller

Ronald P. Schiller (*pro hac vice*)

Sharon F. McKee (*pro hac vice*)

One Logan Square, 27th Floor

Philadelphia, PA 19103-6933

Telephone: (215) 568-6200

Facsimile: (215) 568-0300

rschiller@hanglely.com

smckee@hanglely.com

-and-

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP**

James Burd (TN Bar No. 34940)

Jamie K. Durrett (TN Bar No. 26278)

3102 W. End Ave; Suite 400

Nashville, Tennessee 37203

james.burd@wilsonelser.com

jamie.durrett@wilsonelser.com

*Attorneys for Plaintiff Arch Insurance
Company*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 20, 2025, the foregoing was filed electronically with the Court and has been served through the Court's ECF system on all counsel of record.

/s/ Ronald P. Schiller
Ronald P. Schiller (*pro hac vice*)